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OAKLAND, CALIFORNIA

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16 *Attorneys for Defendant* Zuffa, LLC, d/b/a  
17 Ultimate Fighting Championship and UFC

18 UNITED STATES DISTRICT COURT

19 NORTHERN DISTRICT OF CALIFORNIA - SAN JOSE DIVISION

20 Cung Le, Nathan Quarry, Jon Fitch, on behalf  
21 of themselves and all others similarly situated,

Case No. 5:14-cv-05484 EJD

22 Plaintiffs,

**STIPULATION AND [PROPOSED]  
ORDER STAYING DISCOVERY  
PENDING RESOLUTION OF THE  
MOTION TO TRANSFER**

v.

23 Zuffa, LLC, d/b/a Ultimate Fighting  
24 Championship and UFC,

25 Defendant.

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1 Luis Javier Vazquez and Dennis Lloyd  
2 Hallman, on behalf of themselves and all  
3 others similarly situated,

4 Plaintiffs,

5 v.

6 Zuffa, LLC, d/b/a Ultimate Fighting  
7 Championship and UFC,

8 Defendant.

Case No. 5:14-cv-05591 EJD

9 Brandon Vera and Pablo Garza, on behalf of  
10 themselves and all others similarly situated,

11 Plaintiffs,

12 v.

13 Zuffa, LLC, d/b/a Ultimate Fighting  
14 Championship and UFC,

15 Defendant.

Case No. 5:14-cv-05621 EJD

16 Gabe Ruediger and Mac Danzig, on behalf of  
17 themselves and all others similarly situated,

18 Plaintiffs,

19 v.

20 Zuffa, LLC, d/b/a Ultimate Fighting  
21 Championship and UFC,

22 Defendant.

Case No. 5:15-cv-00521 EJD

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1        Kyle Kingsbury and Darren Uyenoyama, on  
2        behalf of themselves and all others similarly  
3        situated,

Case No. 5:15-cv-01324 EJD

3              Plaintiffs,

4              v.

5        Zuffa, LLC, d/b/a Ultimate Fighting  
6        Championship and UFC,

7              Defendant.

B O I E S , S C H I L L E R & F L E X N E R L L P  
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1 Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Luis Javier Vazquez, Dennis Lloyd  
 2 Hallman, Brandon Vera, Pablo Garza, Gabe Ruediger, Mac Danzig, Kyle Kingsbury, and Darren  
 3 Uyenoyama (collectively, "Plaintiffs") and Defendant Zuffa, LLC d/b/a Ultimate Fighting  
 4 Championship and UFC ("Zuffa"), request that the Court enter the parties' stipulation below  
 5 staying discovery pending the resolution of the Motion to Transfer.

6 WHEREAS Defendant Zuffa has filed a Motion to Dismiss and a Motion to Transfer  
 7 Venue Under 28 U.S.C. § 1404(a) in the above-entitled matters (*Le* Dkt. 31; Dkt. 64);

8 WHEREAS Plaintiffs have opposed those motions (*Le* Dkt. 69; Dkt. 71);

9 WHEREAS the Motion to Transfer venue is fully briefed and was argued and submitted  
 10 on May 7, 2015;

11 WHEREAS the Motion to Dismiss is fully briefed and is scheduled for argument on July  
 12 23, 2015;

13 WHEREAS the Defendant has moved to stay discovery pending the resolution of the  
 14 Motions to Transfer and Dismiss (*Le* Dkt. 87);

15 WHEREAS the Plaintiffs intend to oppose the Motion to Stay Discovery to the extent that  
 16 it would stay discovery pending resolution of the Motion to Dismiss;

17 WHEREAS the parties wish to conserve their own and judicial resources in resolving  
 18 these issues;

19 THE PARTIES STIPULATE AND AGREE AS FOLLOWS:

- 20 1. Discovery will be stayed pending the resolution of the pending Motion to Transfer;
- 21 2. Defendant's Motion to Stay Discovery will be held in abeyance pending resolution of the  
     Motion to Transfer;
- 22 3. Once the Motion to Transfer is resolved, Plaintiffs may respond to the pending Motion to  
     Stay no later than 30 days after the Court's order on the Motion to Transfer and Zuffa will  
     file its Reply no later than 14 days after Plaintiffs file their response;
- 23 4. If the action is transferred to the District of Nevada, the parties will rely on their existing  
     briefing on the Motion to Dismiss, rather than re-briefing the Motion, subject to  
     compliance with the District of Nevada's Local Rules and, to the extent required, approval

1 of the Court in the transferee District. Nothing in this paragraph shall prevent either party  
2 from providing notices of supplemental authority or similar additional material to the  
3 Court to the extent permitted under the Federal Rules or any applicable Local Rule if  
4 circumstances warrant.

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7 Dated: May 29, 2015

/s/ John F. Cove, Jr.

John F. Cove, Jr.  
BOIES, SCHILLER & FLEXNER LLP  
*Counsel for Defendant Zuffa, LLC*

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10 Dated: May 29, 2015

/s/ Matthew S. Weiler

Joseph R. Saveri  
Matthew S. Weiler  
JOSEPH SAVERI LAW FIRM, INC.  
*Counsel for Plaintiffs*

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14 Pursuant to Local Rule 5.1(i)(3) I attest that all other signatories listed, and on whose behalf the  
15 filing is submitted concur in the filing's content and have authorized the filing.

16  
17 Dated: May 29, 2015

By: /s/ John F. Cove, Jr.

John F. Cove, Jr.

BOIES, SCHILLER & FLEXNER LLP  
OAKLAND, CALIFORNIA

## [PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: \_\_\_\_\_, 2015

Honorable Edward J. Davila  
United States District Judge

BOIES, SCHILLER & FLEXNER LLP  
OAKLAND, CALIFORNIA